Before the

FEDERAL COMMUNICATIONS COMMISSION Washington, DC. 20554

In the Matter of)	
)		
Changes in Part 97)	RM - 1086	9
With Regard to Amateur Radio)		
Service Rules, Element 1)		

To: The Commission

I would like to thank the Commission for the opportunity to comment on RM-10869. I am Amateur Radio Operator KCOARF who was licensed in 1997, and I am a Technician Class operator. I am particularly active in Skywarn weather collection activities, along with Amateur Radio social activities.

I am **not** in favor of this proposal.

Last summer, the World Radio Conference (WRC-03) changed Article 25.5 to read as follows:

25.5 S3 1) Administrations shall determine whether or not a person seeking a license to operate an amateur station shall demonstrate the ability to send and receive texts in Morse code signals.

Several other countries have relaxed the code requirement, and I feel that it is time for the United States to do the same.

Mr. Lowrance's opinion that Morse Code (CW) is a necessary skill for Amateur Radio Operators to possess carries little weight in today's communications networks. If CW was truly important for an American Citizen to learn, then citizens would be learning it in school alongside basic mathematics and spelling studies. Disasters require every citizen to work together for the common good to rebuild society, and if CW remains as critical as Mr. Lowrance asserts, we all would know CW before we learned how to drive a car.

I would also argue that if CW was a critical part of the Homeland Security, Amateur Radio Operators would have mandatory drills involving Morse Code, and yearly testing of operators to ensure that code skills are retained. Present FCC rules mandate that an operator pass the test *once* in order to receive credit. Unless that operator maintains regular CW conversations, I would doubt that 10 years after passing the exam, that the operator could pass it again.

Morse Code is nothing more than a means to communicate. Knowing CW does not add technical knowledge, nor complements on-air behavior with other operators. CW knowledge will not assist in antenna designs, will not help with RF-based computer networks, and will not save the United States in a disaster.

Conclusion

I urge the Commission to decline RM-10869 on the grounds that CW is merely a communications mode, and it is not a communications standard, nor is it critical to Homeland Security.

Thank you for your attention.

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